

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
MIAMI DIVISION**

CASE NO.:23-24670-CIV-LENARD/DAMIAN

**SHANTEE REESE,**

Plaintiff,

v.

**ALORICA, INC.,**

a Foreign Profit Corporation,

Defendant.

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**DEFENDANT’S *UNOPPOSED* MOTION FOR EXTENSION OF TIME  
TO RESPOND TO COMPLAINT**

Defendant, Alorica, Inc. (“Defendant”), by and through their undersigned counsel, hereby moves, on an unopposed basis, for a 2-week extension of time to respond to Plaintiff’s Complaint, up to and including, Tuesday, January 2, 2024. In support, Defendant states as follows:

1. On November 02, 2023, Plaintiff, Shantee Reese (“Plaintiff”) filed the operative Complaint alleging claims under the Florida Civil Rights Act of 1992 (“FCRA”) and the Miami-Dade County Human Rights Ordinance (“MDHRO”).
2. Defendant retained undersigned counsel and Jackson Lewis, P.C. to represent it in connection with this case, and removed the instant case to this Court.
3. Defense counsel is in need of additional time to obtain pertinent documentation and review contracts executed by Plaintiff in order to determine how to respond to this action.
4. Additionally, and perhaps more importantly, counsel for the parties have made some progress towards an early resolution of this matter and wish to continue to explore the possibility this matter could resolve without a response to the Complaint having to be filed.

5. In light of the above, Defendant requests that the Court grant Defendant fourteen (14) additional days to respond to the Complaint up to including, Tuesday, January 2, 2024.

6. Undersigned counsel conferred with Plaintiff's counsel regarding this request for an extension and Plaintiff's counsel **does not oppose** this request.

7. This Motion is made in good faith and not for purposes of delay. Moreover, no party will be prejudiced by the granting of this Motion.

WHEREFORE, Defendant respectfully requests that the Court grant Defendant's unopposed request for a 14-day extension of time, up to and including Tuesday, January 2, 2024, in which to file their response to Plaintiff's Complaint.

Dated: December 18, 2023

Respectfully submitted,

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/s/ Dion Cassata  
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*Counsel for Defendant*

CASE NO.: 2023-025883-CA-01

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 18<sup>th</sup> day of December 2023, I electronically filed the foregoing document with the Clerk of the Court using Florida's E-Portal filing system. I also certify that the foregoing document is being served this day to counsel Kyle T. MacDonald ([Kyle@dereksmithlaw.com](mailto:Kyle@dereksmithlaw.com)), DEREK SMITH LAW GROUP, LLC, 520 Brickell Key Drive, Suite O-301, Miami, Florida 33131.

s/ Dion Cassata  
Dion Cassata, Esq.